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RIVERSIDE, RIVERSIDE COUNTY
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DEP. WILLIAM ROBINSON, C. DEP.
JASON NGUYEN, C. DEP. MIRANDA,
JULIE COX, NAJIA OUGZIN-
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CID, and DR. THOMAS MCNAHAN,
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*Attorney for Plaintiffs, S.V., a minor, by and through her guardian ad litem
Elba Cervantes, Naomi Bravo and Esteban Viramontes*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

S.V., A Minor, Individually, And As
Personal Representative Of The Estate
Of Cristian Viramontes, By And
Through Her Guardian Ad Litem, Elba
Cervantes; Naomi Bravo Individually,
Esteban Viramontes, individually,

Plaintiffs,

v.

COUNTY OF RIVERSIDE, a
Governmental Agency: RIVERSIDE

Case No. 5:23-cv-00860-SSS-KK
*Honorable Sunshine S. Sykes, District
Judge*
*[Honorable Kenly Kiya Kato,
Magistrate Judge]*

**JOINT NOTICE OF SETTLEMENT
OF ENTIRE ACTION**

COUNTY SHERIFF CHAD BIANCO,
in his individual and official capacity,
Deputy DUNCAN, individually;
Correctional Corporal CRAIG
HARRIS, individually; Correctional
Deputy WILLIAM ROBINSON,
individually; Correctional Deputy
JASON NGUYEN, individually;
Correctional Deputy MIRANDA,
individually; JULIE COX, individually;
NAJIA OUGZIN-MCILVOY,
individually; JOCELYN MENDOZA
CID individually; DR. THOMAS
MCNAHAN, M.D., individually; and
DOES 9-10, inclusive,

Defendants.

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
COUNSEL OF RECORD:**

PLEASE TAKE NOTICE THAT, pursuant to the United States District Court, Central District of California's Local Rules, Rule 16-15.7, by and among S.V., a minor, individually, and as personal representative of the Estate of Cristian Viramontes, by and through her guardian ad litem, Elba Cervantes; Naomi Bravo individually; and Estaban Viramontes, individually (collectively referred to as "Plaintiffs"), County of Riverside; Riverside County Sheriff Chad Bianco; C. Deputy Duncan; C. Cpl. Craig Harris; C. Deputy William Robinson; C. Deputy Miranda; C. Deputy Jason Nguyen; Julie Cox; Najia Ougzin-McIlvoy; Jocelyn Mendoza Cid; and Dr. Thomas McNahan, M.D., (collectively referred to as "Defendants"), through counsel—the parties—hereby submit the following Notice of Settlement of the Entire Action, pending the filing by the parties of a Stipulated Joint Request for Partial Dismissal of Parties—Defendants RIVERSIDE COUNTY SHERIFF CHAD BIANCO; C. DEPUTY DUNCAN, C. CPL. CRAIG HARRIS, C. DEPUTY WILLIAM ROBINSON, C. DEPUTY JASON NGUYEN, C. DEPUTY MIRANDA, JULIE COX, NAJIA OUGZIN-MCILVOY, JOCELYN MENDOZA CID, and DR. THOMAS MCNAHAN, M.D.—*without prejudice*

1 which will be filed shortly. With this Notice of Settlement, it is the County of
2 Riverside's intent to inform the Court and Courtroom's Deputy Clerk immediately of
3 the settlement between the parties, which occurred on Wednesday, January 10,
4 2024, including the terms of settlement.

5 On January 10, 2024, Defendant COUNTY OF RIVERSIDE and Plaintiffs
6 entered into a settlement agreement in the above-referenced matter, subject to full
7 execution of a mutually-acceptable written release of all claims, and the Court's
8 approval of the instant Defendant COUNTY's Notice of Settlement and forthcoming
9 Minor's Compromise.

10 As a term and condition of the settlement agreement, the parties agreed to the
11 forthwith dismissal of Individual Defendants RIVERSIDE COUNTY SHERIFF
12 CHAD BIANCO; C. DEPUTY DUNCAN, C. CPL. CRAIG HARRIS, C.
13 DEPUTY WILLIAM ROBINSON, C. DEPUTY JASON NGUYEN, C. DEPUTY
14 MIRANDA, JULIE COX, NAJIA OUGZIN-MCILVOY, JOCELYN MENDOZA
15 CID, and DR. THOMAS MCNAHAN, M.D., including all causes of action/claims
16 and portions of claims alleged against them, including all costs of suit, and all types
17 of damages alleged against them in plaintiffs' operative First Amended Complaint
18 for Damages [Doc. 54] *without prejudice* from this action.

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1 DATED: January 17, 2024

Respectfully submitted,

2 **MANNING & KASS**
3 **ELLROD, RAMIREZ, TRESTER LLP**

4
5 By: /s/ Deann R. Rivard

6 Eugene P. Ramirez

7 G. Craig Smith

8 Deann R. Rivard

9 Attorneys for Defendants, COUNTY OF

10 RIVERSIDE, RIVERSIDE COUNTY

11 SHERIFF CHAD BIANCO, C. DEP.

12 DUNCAN, C. CPL. CRAIG HARRIS, C.

13 DEP. WILLIAM ROBINSON, C. DEP.

14 JASON NGUYEN, C. DEP. MIRANDA,

15 JULIE COX, NAJIA OUGZIN-

16 MCILVOY, JOCELYN MENDOZA, CID,

17 and DR. THOMAS MCNAHAN, M.D.

18
19 DATED: January 17, 2024

THE SEHAT LAW FIRM, PLC

20 /s/ Cameron Sehat

21 Cameron Sehat, Esq.

22 Attorney for Plaintiffs

1 [Signature Attestation.] As to this Stipulation and Joint Request, filed
2 pursuant to U.S.D.C. Central District Court Local Rule 5-4.3.4: the undersigned
3 hereby certifies that the content of this document is acceptable to all parties listed
4 above, by and through their counsel of record, and that the undersigned has obtained
5 authorization from each party's counsel to affix their electronic signatures to this
6 document.

7
8 DATED: January 17, 2024

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

9
10 By: /s/ Deann R. Rivard

11 Deann R. Rivard
12 Attorneys for Defendants, COUNTY OF
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